

# **EXHIBIT 15**

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6 THE HONORABLE JAMAL N. WHITEHEAD  
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10 UNITED STATES DISTRICT COURT  
11 WESTERN DISTRICT OF WASHINGTON  
12 AT SEATTLE  
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15 PLAINTIFF PACITO; PLAINTIFF ESTHER;  
16 PLAINTIFF JOSEPHINE; PLAINTIFF SARA;  
17 PLAINTIFF ALYAS; PLAINTIFF MARCOS;  
18 PLAINTIFF AHMED; PLAINTIFF RACHEL;  
19 PLAINTIFF ALI; HIAS, INC.; CHURCH  
20 WORLD SERVICE, INC.; and LUTHERAN  
21 COMMUNITY SERVICES NORTHWEST,  
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24 *Plaintiffs,*  
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26 v.

27 DONALD J. TRUMP, in his official capacity as  
28 President of the United States; MARCO RUBIO,  
29 in his official capacity as Secretary of State;  
30 KRISTI NOEM, in her official capacity as  
31 Secretary of Homeland Security; DOROTHY A.  
32 FINK, in her official capacity as Acting Secretary  
33 of Health and Human Services,  
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36 *Defendants.*  
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39 Case No. C25-255 JNW  
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42 **DECLARATION OF PLAINTIFF  
43 ESTHER**

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**DECLARATION OF ESTHER**

I, Esther, declare as follows:

1. I am 62 years old, and I am of sound mind.
2. My daughter is waiting to travel to the United States as a refugee. I petitioned for her through the “follow-to-join” process in 2017.
3. She was on the verge of travel to the United States when we learned that she could not travel because of the refugee suspension.
4. I live in Boise, Idaho.
5. I am a citizen of the United States.
6. I work full-time as a cleaner at a local hospital.
7. I am involved with my church and the local Congolese community.
8. My daughter lives in Durban, South Africa.
9. I am married and live with my husband and two of my children, all of whom came to the United States with me in 2016 as refugees. Another of my children lives nearby in Boise.
10. My family is from the Democratic Republic of the Congo (“DRC”). We fled the DRC many years ago because of the war. My daughter was very young at the time.
11. We fled to Tanzania where we lived in a refugee camp.
12. We had a very difficult life in Tanzania. As refugees, we could not control what we ate, where we slept, what we did. The refugee camp felt like a prison.
13. Life in the camp was especially difficult and dangerous for young women like my daughter. And my daughter wanted to go to school, but there were no options for her to continue her studies. When my daughter wanted to try to leave the camp, I supported her. Eventually, she went to South Africa.

14. The rest of my family stayed behind in the camp. I had filed for refugee resettlement in the United States. I waited for the application to be processed.
15. I came to the United States as a refugee in 2016 with my husband and my three sons.
16. I understood from non-governmental organization workers that my daughter would be able to join us in the United States a short time later.
17. I filed a follow-to-join petition for my daughter in 2017.
18. My daughter's case moved very slowly because of government delays. For example, the government requested DNA evidence to confirm my relationship with my daughter. I provided proof that I had completed the government's DNA test, but the government delayed more than three years in arranging DNA testing for my daughter.
19. Finally, I filed a case in federal court asking the judge to order the government to make a decision on my petition.
20. After that, my daughter's refugee case moved through multiple processing steps. My petition was approved, my daughter completed her medical exams, and a resettlement agency in Idaho assured her.
21. She was on the verge of travel when Donald Trump announced the refugee suspension.
22. I felt so happy at the thought that we would finally be together. She was going to live in my house with me. I bought a new bed, blankets, and sheets for her.
23. When I learned that President Trump was suspending refugee admissions, I felt extremely sad. It was particularly painful for me to hear this news because two weeks ago, I had received the news that my son who lives in a refugee camp in Tanzania had died. I was hoping my daughter would be here soon to accompany me in my grieving.

24. I fear that if my real name becomes public in this lawsuit, my daughter will not be safe because of the discrimination and violence against refugees in South Africa where she lives. If people find out my daughter is a refugee and that she was about to travel to the United States, I worry they may harm her. I live in fear for my daughter. Two of my sons have already died in refugee camps.
25. I understand that some people in the United States have been publishing the names and personal details online of people who criticize the Trump Administration, and I am very fearful that if my name is disclosed in this lawsuit, that the case could end up on social media and people will see my name, and this could put me and my family at risk of harassment and violence.
26. I fear that if my real name becomes public in this lawsuit, my daughter's pending refugee application could be jeopardized. My follow-to-join application for my daughter remains pending and is in final stages of processing, and I do not want my participation in the lawsuit to delay or prevent my daughter from coming to safety in the United States.
27. For these reasons, I believe that my personal security and that of my family necessitates that I be allowed to use a pseudonym in this case.
28. I am willing to serve as a class representative on behalf of those who are similarly situated to me who are trying to help their families come to safety in the United States through the refugee program, including through the follow-to-join process.
29. I know that if the class is certified, I will be representing more than just myself in this case. I will be representing the interests of other refugee family members. I understand what being a class representative means.

30. I want to help everyone in my situation because I know how hard it is to be separated from your family by the refugee process. I am willing to be actively involved in this lawsuit as a class representative and to work with my attorneys to help all of the class members.
31. This declaration has been read to me aloud in Swahili, a language I understand, and I have understood it and verified its contents.

I declare under Penalty of Perjury  
that the Forgoing is true and Correct

Date 09/02/2025

**REDACTED**